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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO  
individually and on behalf of all similarly  
situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF M. LOGAN  
WRIGHT IN SUPPORT OF  
PLAINTIFFS' MOTION *IN LIMINE*  
NUMBER 1 TO PRECLUDE GOOGLE  
FROM RELYING ON NON-PUBLIC  
SOURCE CODE AT TRIAL**

Judge: Hon. Yvonne Gonzalez Rogers

**DECLARATION OF M. LOGAN WRIGHT**

I, M. Logan Wright, attorney, declare as follows.

1. I am an associate with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California and appearing for this case. Dkt. 935. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this declaration in support of Plaintiffs' Motion *In Limine* Number 1 to Preclude Google from Relying on Non-Public Source Code at Trial (the "Motion").

3. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Request for Production of Documents to Defendant Google LLC, Set Two.

4. Attached hereto as Exhibit 2 is a true and correct copy of Defendant's Responses and Objections to Plaintiffs' Second Set of Requests for Production (Nos. 20–149).

5. Attached hereto as Exhibit 3 is a true and correct copy of a letter from Plaintiffs' Counsel to Google Counsel, dated April 30, 2021.

6. Attached hereto as Exhibit 4 is a true and correct copy of a letter from Google Counsel to Plaintiffs' Counsel, dated May 25, 2021.

7. Attached hereto as Exhibit 5 is a true and correct copy of a letter from Plaintiffs' Counsel to Google Counsel, dated June 30, 2021.

8. Attached hereto as Exhibit 6 is a true and correct copy of an email from Google Counsel to Plaintiffs' Counsel, dated February 22, 2023.

9. With this motion in *limine*, Plaintiffs seek to exclude Google Trial Exhibits 697 and 698. Google Exhibit 697 is an excerpt of source code which Google provided briefly to Plaintiffs during the sanctions process. Plaintiffs no longer have a copy of this document. Google Trial Exhibit 698 is attached hereto as Appendix A. It is a copy of a document that Google produced in discovery, bearing Bates Label GOOG-BRWN-00858535. Plaintiffs seek to exclude use of this document at trial.

I declare under penalty of perjury under the laws of the United States of America that the

1 foregoing is true and correct. Executed this 17th day of October, 2023, at Los Angeles, California.

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/s/ M. Logan Wright

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